

From: [McKenzie, Jill](#)
To: [Mitchell, Tanya](#)
Subject: Rolling Knolls LF - Comments on Tech Memo on Candidat Technologies
Date: Wednesday, May 06, 2015 3:39:38 PM

Hi Tanya. Below please find the NJDEP's comments on the Technical Memorandum on Candidate Technologies (TMCT) which was provided to us via hard copy on March 25, 2015. I will follow up this email with a formal correspondence which includes these same comments.

A. General Comments

1. In terms of assessment of human health and environmental conditions at the site, NJDEP comments provided on the previously-submitted *Data Gap Sampling Results* (sent via email on 3/13/15) still apply to the project, but are not reiterated here. It was noted (page 12) that the TMCT states "The results of the SLERA indicated that further evaluation of potential risk is warranted."
2. Based on information and figures provided in the TMCT, delineation of contamination to the NJDEP promulgated Soil Remediation Standards (SRS), particularly in soils, is far from complete. Existing data should be closely examined to identify all areas in need of horizontal and/or vertical delineation.

B. Specific Comments

1. *Section 1.1, first paragraph*, notes that "information and understanding of site conditions (physical and chemical) gathered during the Remedial Investigation (RI) activities and summarized in the Site Characterization Summary Report (SCSR, Arcadis 2012) provide the basis for the technology screening in the TMCT." The NJDEP currently has only one hard copy of the SCSR in its archives. Since the SCSR contains useful information, and is often referenced in the TMCT, it is requested that the USEPA forward a digital copy of this report to the NJDEP Case Manager for ease of future reference by the DEP case team.
2. *Figure 7, Groundwater Analytical Results*, provides data from existing wells from samples collected in December 2007 and February 2008. Arcadis should incorporate data from the wells and temporary well points which were sampled in December 2014, which were provided in the Data Gap Interim Report, or explain why these data were not considered in the revised TMCT. Sampling results from December 2014 included compounds not otherwise reported in Figure 7 (e.g. 4,4-DDT, dieldrin, cadmium, chromium, copper, cyanide, nickel, mercury, vanadium, benzo(a)anthracene, benzo(a)pyrene, benzo(b)fluoranthene, benzo(k)fluoranthene, and total PCBs).
3. *Section 4.3.2, Institutional Controls*, should note that the NJDEP will require a Classification Exception Area (CEA) for ground water at the site since the Ground Water Quality Criteria for the Class IIA ground water are not being met or will not be met at the site. The ARRCs at N.J.A.C. 7:26C-7.3 contain the requirements for establishing, revising and removing a CEA for existing ground water contamination at the site, which includes use of the CEA/Well Restriction Area (WRA).
3. Table 1, Constituent Classes. The ground water section states that PCBs were eliminated from further evaluation, but PCBs were reported above the Ground Water Quality Criterion of 0.5 ppb in the December 2014 samples from TWP-3, TWP-4, and TWP-8. Similarly, PAHs were excluded because the "constituent class [was] not detected at concentrations greater than Groundwater Quality Standard". However, PAHs (e.g. benzo(a)anthracene, benzo(a)pyrene, benzo(b)fluoranthene, benzo(k)fluoranthene) were reported in SVOC SIM samples in several

temporary well points. Arcadis should reconsider the elimination of these constituent classes.